

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION-FLINT**

IN RE:
Thao Nguyen,

CHAPTER 13
CASE NO: 19-31231
JUDGE: Joel D. Applebaum

Debtors

DEBTOR'S RESPONSE TO CREDITOR'S MOTION FOR RELIEF FROM STAY

NOW COMES the Debtor by and through his attorney in this response to the motion for relief from the automatic stay. The Debtor states the following:

1. Denies. The Debtor filed bankruptcy in 2019.
 2. Neither admits or denies.
 3. Neither admits or denies. The Debtor is a nail tech and due to coronavirus shut downs is not able to work.
 4. Neither admits or denies.
 5. Denies.
 6. Neither admits or denies. But under a national pandemic that has caused the debtor to not legally go back to work the Creditor doesn't have good cause.
 7. Admits.
 8. The Debtor is still waiting on his unemployment and has had problems due to language barriers.
 9. The Debtor is a nail tech and the Governor has an order not allowing him to work. This would be unjust to take his car at this point.
 10. Once income returns a plan modification can be filed to address the arrears at that point.
- WHEREFORE, the Debtor requests this motion to be denied.

 /s/ Doug Dern
Doug Dern (P64567)
11636 Highland Rd. #107
Hartland MI 48353
810-632-9160
Law4less@aol.com

